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Food and Drug Administration  
Division of Dockets Management  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Docket Numbers 1996P-0418, 1997P-0197, 1998P-0203, and 2000N-0504

As a veterinarian, it is my responsibility to provide for the health and well-being of nonhuman animals of various types. One of the fundamental considerations for this is the provision of adequate nourishment. To withhold this, when it is not medically indicated, would cause severe diminishment in the well-being of the individual, as well as put the individual at risk for disease and death.

It is, therefore, alarming that the poultry industry utilizes and advocates the withholding of *all* food for up to 14 days in order to synchronize the laying cycle of hens used for egg production. This industry standard, known as forced molting, is part of textbooks on the subject and is taught in animal science courses. It is *not* done for the benefit of the hens. It is *not* done because it is medically indicated. It is done simply to maximize profits for the producer.

The ethical costs of forced molting are astronomical. The chickens are placed in a position of literally being starved, which causes severe diminishment in their well-being. They are so severely stressed that many undergo *distress*, which is the situation when the body cannot deal effectively with a stressful stimulus. Although stress is unavoidable in life and can be beneficial to survival, to cause an individual distress is cruel, especially when it is not intended to help the individual. The distress can be so great that a substantial number of the chickens will not survive the forced molting process. This is testimony to the suffering inflicted on these birds.

The withholding of food from *any* individual when this is not intended to help the individual is morally unconscionable and should not be condoned by thoughtful, compassionate and humane minded people. No rational person would do this to cats, dogs or other animals. It is ethically, biologically and legally inconsistent to do it to chickens.

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